PATENT
Attorney Docket No. 0050-0128

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of:	)	
	)	
Kazuhiko Sugiyama et al.	)	Group Art Unit: 2665
	)	
Serial No.: 09/816,705	)	Examiner: D. Ryman
	)	
Filed: March 23, 2001	)	
	)	
For: INTERNET TELEPHONE SYSTEM ENSURING COMMUNICATION PATH SETTING METHOD	)	

APPEAL BRIEF

U.S. Patent and Trademark Office
Customer Window, Mail Stop Appeal Brief – Patents
Randolph Building
401 Dulany Street
Alexandria, Virginia 22314

Sir:

This Appeal Brief is submitted in response to the Final rejection mailed December 27, 2005 and in support of the Notice of Appeal filed March 27, 2006.

I. REAL PARTY IN INTEREST

The real party in interest in this appeal is Juniper Networks, Inc.

II. RELATED APPEALS AND INTERFERENCES

Appellants are unaware of any related appeals, interferences or judicial proceedings.

III. STATUS OF CLAIMS

Claims 1-17 are pending in this application. All of the pending claims are the subject of the present appeal.

IV. STATUS OF AMENDMENTS

An After Final Amendment was filed on February 27, 2005. The Advisory Action mailed March 7, 2006 indicates that for purposes of appeal, the After Final Amendment would be entered. Therefore, the After Final Amendment filed on February 27, 2005 has been entered.

V. SUMMARY OF THE CLAIMED SUBJECT MATTER

Each of the independent claims involved in this appeal is recited below, followed in parenthesis by examples of where support can be found in the specification and drawings for the claimed subject matter. In addition, each dependent claim argued separately below is also summarized in a similar manner.

Claim 1 recites: An Internet telephone system for voice communication between a telephone subscribing to a first voice network and a telephone subscribing to a second voice network via a network using an Internet protocol, comprising: a plurality of label switch routers configured to use a label switching technique (Fig. 3, LSRs 34-38; page 10, fourth paragraph); a first media gateway (Fig. 3, 45) coupled to a first one of the plurality of label switch routers (Fig. 3, 34) and a first signaling transfer point (Fig. 3, 43) connected to said first voice network (Fig. 3, 39; page 10, fourth paragraph); a second media gateway (Fig. 3, 46) coupled to a second one of

the plurality of label switch routers (Fig. 3, 36) and a second signaling transfer point (Fig. 3, 44) connected to said second voice network (Fig. 3, 40); a path control unit configured to: determine whether a first path having a first bandwidth larger than a bandwidth necessary for transferring a voice over Internet protocol (VoIP) packet between said first label switch router and said second label switch router exists (Fig. 3, 311; page 3, lines 4-7, page 12, first paragraph), and when it is determined that the first path having the first bandwidth does not exist, set a new path having a bandwidth that is equal to or more than double the bandwidth necessary for transferring the VoIP packet (page 3, lines 7-9, page 12, first paragraph); and a packet control unit (Fig. 3, 312), coupled to said path control unit, configured to: instruct said first media gateway and said second media gateway to transfer VoIP packets via the first path or the new path (page 3, lines 9-12, page 16, second full paragraph, page 180, second full paragraph; Fig. 5, A3-A17).

Claim 2 recites: The Internet telephone system of claim 1, wherein the new path has a bandwidth that is equal to or more than a hundred times the first bandwidth (page 12, first paragraph).

Claim 6 recites: A path setting method of setting a path to which a bandwidth is ensured on a network using an Internet protocol connected between a first voice network and a second voice network to execute voice communication between a telephone associated with the first voice network and a telephone associated with the second voice network, comprising: determining whether a first path having a residual bandwidth larger than a first bandwidth necessary for transferring a voice over Intent protocol (VoIP) packet between two edge label

switch routers exists (page 3, first full paragraph, page 14, second full paragraph); and setting a new path having a bandwidth that is equal to or more than double the first bandwidth, when it is determined that the first path does not exist (page 3, first full paragraph, page 14, last sentence to page 15, line 2).

Claim 8 recites: A call control apparatus for setting a path to which a bandwidth is ensured on a network using an Internet protocol connected to a first voice network and a second voice network to execute voice communication between a telephone coupled to said first voice network and a telephone coupled to said second voice network, comprising: a path control unit (Fig. 3, 311) configured to: determine whether a first path having a residual bandwidth larger than a first bandwidth necessary for transferring a voice over Internet protocol (VoIP) packet between a first label switch router and a second label switch router exists (page 4, lines 1-4, page 14, second full paragraph), and when it is determined that the first path does not exist, set a second path having a bandwidth that is equal to or more two times the first bandwidth (page 4, lines 4-7, page 12, first paragraph, page 14, last sentence to page 15, line 2); and a packet control unit (Fig. 3, 312) configured to control a first media gateway and a second media gateway connected to said first and second label switch routers, respectively, to transfer said VoIP packet via the first path or said second path (page 4, lines 7-10, page 12, last paragraph to page 13, line 4).

Claim 10 recites: A router connected between a first voice network and a second voice network to implement voice communication between a telephone associated with a first voice

network and a telephone associated with a second voice network, comprising: logic configured to set a path having a first bandwidth that is at least two times a bandwidth necessary for transferring a voice over Internet protocol (VoIP) packet in accordance with control by a call control apparatus (page 4, first full paragraph, page 14, second full paragraph to page 15, line 2); Fig. 3, router 34), thereby establishing a plurality of connections in said path.

Claim 13 recites: A computer program product for implementing a call control apparatus for setting a path between a first voice network and a second voice network, said computer program product comprising: instructions for determining whether a first path having a bandwidth larger than a bandwidth necessary for transferring a voice over Internet protocol (VoIP) packet between two label switch routers exists (page 4, second full paragraph, page 14, second full paragraph); instructions for setting, when it is determined that the first path does not exist, a new path having a bandwidth that is equal to or more than two times the first bandwidth (page 14, last sentence to page 15, line 2); and instructions for controlling a media gateway connected to at least a first one of said two label switch routers to transfer said VoIP packet via the first path or said new path (page 5, lines 3-5, page 14, last paragraph to page 15, line 4).

Claim 15 recites: A device, comprising: a controller (Fig. 3, 311) configured to: receive a call request associated with establishing a voice connection between a first device and a second device via a network, the voice connection using voice over Internet protocol (VoIP) (page 11, first full paragraph), determine whether a first label switching path exists in the network between a first router and second router, the first router and second routers being involved in routing VoIP

packets between the first device and second device (page 14, second full paragraph), and request, when the first label switching path does not exist, that the first router establish a second label switching path to the second router, the second label switching path having a bandwidth of at least two times a bandwidth needed for transferring a VoIP packet between the first and second devices (page 14, last sentence to page 15, line 2).

VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

A. Claim 10 has been rejected under 35 U.S.C. § 102(e) as being anticipated by Doshi et al. (U.S. Patent No. 6,529,499; hereinafter Doshi).

B. Claims 1-9 and 11-17 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Doshi.

VII. ARGUMENT

A. Rejection under 35 U.S.C. § 102 based on Doshi

1. Claim 10

The initial burden of establishing a *prima facie* basis to deny patentability to a claimed invention always rests upon the Examiner. In re Oetiker, 977 F.2d 1443, 24 USPQ2d 1443 (Fed. Cir. 1992). A proper rejection under 35 U.S.C. § 102 requires that a single reference teaches every element set forth in the claim, either expressly or inherently. See M.P.E.P. § 2131.
With these principles in mind, claim 10 recites a router connected between a first voice network and a second voice network to implement voice communication between a telephone associated with a first voice network and a telephone associated with a second voice network. The router

comprises logic configured to set a path having a first bandwidth that is at least two times a bandwidth necessary for transferring a voice over Internet protocol (VoIP) packet in accordance with control by a call control apparatus, thereby establishing a plurality of connections in said path.

The Final Office Action states that Doshi discloses a router that includes logic configured to set a path having a first bandwidth that is least two times a bandwidth necessary for transferring a VoIP packet in accordance with control by a call control apparatus and points to router 220 and virtual provisioning server 230 along with col. 4, line 65 to col. 5, line 6 for support (Final Office Action – page 4).

Doshi discloses that virtual provisioning server 230 determines capacity requirements over each path between IP network routers 220 (Doshi – col. 4, lines 32-35). Doshi also discloses that the capacity requirements for routers 220 are virtually provisioned within available bandwidth capacity for delay sensitive traffic requirements (Doshi – col. 4, lines 36-40). Doshi at col. 4, line 65 to col. 5, line 6 discloses that virtual provisioning server 230 calculates the need for added capacity within IP network 205 to meet current and future bandwidth needs. This portion of Doshi further discloses that by centrally calculating and determining required network bandwidth, virtual provisioning server 230 determines the maximum number of voice calls that can be supported simultaneously between any pair of packet circuit gateways 215.

Doshi, however, does not disclose or suggest that router 220 includes logic to set a path having a first bandwidth that is at least two times a bandwidth necessary for transferring a VoIP packet in accordance with control by a call control apparatus, as required by claim 10. In contrast, Doshi merely discloses that provisioning server 230 provisions available bandwidth

capacity for delay sensitive traffic and delay insensitive traffic and calculates the maximum number of voice calls that can be supported.

In response to similar arguments made in the previous response, the Final Office Action states that Doshi discloses that each path has a bandwidth that is sufficient to support multiple connections "such that each path would have a bandwidth equal to or more than double the bandwidth necessary to transfer a single VoIP packet" and points to col. 4, line 65 to col. 5, line 6 for support (Final Office Action – page 2). Appellants respectfully disagree.

As discussed above, Doshi at col. 4, line 65 to col. 5, line 6 discloses that virtual provisioning server 230 calculates the need for added capacity within IP network 205 to meet current and future bandwidth needs. This portion of Doshi further discloses that by centrally calculating and determining required network bandwidth, virtual provisioning server 230 determines the maximum number of voice calls that can be supported simultaneously between any pair of packet circuit gateways 215. Neither this portion of Doshi, nor any other portion of Doshi, discloses or suggests that server 230, or any other device in Doshi, is configured to set a path having a first bandwidth that is at least two times a bandwidth necessary for transferring a VoIP packet in accordance with control by a call control apparatus, as required by claim 10.

The portion of Doshi referenced in the Final Office Action merely discloses calculating the need for added capacity and determining the maximum number of voice calls that can be supported. Such a disclosure is not equivalent to the feature recited in claim 10. In addition, Doshi cannot be fairly construed to disclose that the particularly claimed feature recited in claim 10, discussed above, is somehow inherently disclosed by Doshi's calculating the need for added capacity and determining the maximum number of voice calls that can be supported.

For at least these reasons, Doshi does not disclose or suggest each of the features of claim 10. Accordingly, Appellants respectfully submits that the rejection of claim 10 is improper and reversal of the rejection is respectfully requested.

B. Rejection under 35 U.S.C. § 103 based on Doshi

In rejecting a claim under 35 U.S.C. § 103, the Examiner must provide a factual basis to support the conclusion of obviousness. In re Warner, 379 F.2d 1011, 154 USPQ 173 (CCPA 1967). Based upon the objective evidence of record, the Examiner is required to make the factual inquiries mandated by Graham v. John Deere Co., 86 S.Ct. 684, 383 U.S. 1, 148 USPQ 459 (1966). The Examiner is also required to explain how and why one having ordinary skill in the art would have been realistically motivated to modify an applied reference and/or combine applied references to arrive at the claimed invention. Uniroyal, Inc. v. Rudkin-Wiley Corp., 837 F.2d 1044, 5 USPQ2d 1434 (Fed. Cir. 1988).

In establishing the requisite motivation, it has been consistently held that the requisite motivation to support the conclusion of obviousness is not an abstract concept, but must stem from the prior art as a whole to impel one having ordinary skill in the art to modify a reference or to combine references with a reasonable expectation of successfully achieving some particular realistic objective. See, for example, Interconnect Planning Corp. v. Feil, 227 USPQ 543 (Fed. Cir. 1985). Consistent legal precedent admonishes against the indiscriminate combination of prior art references. Carella v. Starlight Archery, 804 F.2d 135, 231 USPQ 644 (Fed. Cir. 1986); Ashland Oil, Inc. v. Delta Resins & Refractories, Inc., 776 F.2d 281, 227 USPQ 657 (Fed. Cir. 1985).

1. Claims 1 and 3-5

With these principles in mind, claim 1 recites an Internet telephone system that includes a plurality of label switch routers, a first media gateway, a second media gateway, a path control unit and a packet control unit. Claim 1 recites that the path control unit is configured to determine whether a first path having a first bandwidth larger than a bandwidth necessary for transferring a voice over Internet protocol (VoIP) packet between said first label switch router and said second label switch router exists, and when it is determined that the first path having the first bandwidth does not exist, set a new path having a bandwidth that is equal to or more than double the bandwidth necessary for transferring the VoIP packet.

The Final Office Action admits that Doshi does not expressly disclose that when it is determined that the first path having the first bandwidth does not exist, that the virtual provisioning server 230 of Doshi sets a new path having a bandwidth that is equal to or more than double the bandwidth necessary for transferring the VoIP packet (Final Office Action – page 6). The Final Office Action, however, states that Doshi maintains a knowledge base of possible multiple paths between pairs of media gateways and that each path has a band that is sufficient to support multiple connections and points to col. 4, line 65 to col. 5, line 6 for support (Final Office Action – page 6). The Final Office Action further states that "each path would have a band equal to or more than a double band of said necessary band" (Final Office Action – page 6).

Doshi at col. 4, line 65 to col. 5, line 6 discloses that virtual provisioning server 230 calculates the need for added capacity within IP network 205 to meet current and future bandwidth needs. This portion of Doshi further discloses that by centrally calculating and determining required network bandwidth, virtual provisioning server 230 determines the

maximum number of voice calls that can be supported simultaneously between any pair of packet circuit gateways 215. This portion of Doshi cannot be fairly construed to disclose or suggest that server 230 determines whether a first path having a first bandwidth between a first label switch router and a second label switch router exists and when it is determined that the first path having the first bandwidth does not exist, sets a new path having a bandwidth that is equal to or more than double the bandwidth necessary for transferring a VoIP packet, as required by claim 1.

That is, the mere fact that server 230 in Doshi calculates required network bandwidth provisioning cannot be fairly construed to disclose or suggest that server 230 sets a new path (when it is determined that the first path does not exist) having a bandwidth that is equal to or more than double the bandwidth necessary for transferring a VoIP packet, as required by claim 1. In contrast, virtual provisioning server 230 of Doshi merely provisions traffic over existing links. Nowhere in the portions of Doshi referenced in the Final Office Action, or elsewhere in Doshi, does Doshi disclose or suggest setting a new path when it is determined that a first path having a first bandwidth does not exist, much less that the new path has a bandwidth that is equal to or more than double the bandwidth necessary for transferring the VoIP packet, as required by claim 1.

For at least these reasons, Doshi does not disclose or suggest each of the features of claim 1. Accordingly, Appellants respectfully submit that the rejection of claim 1 is improper and reversal of the rejection of claims 1 and 3-5 is respectfully requested.

2. Claims 2, 7, 9 and 11

Claim 2 recites that the new path has a bandwidth that is equal to or more than a hundred times the first bandwidth. The Final Office Action admits that Doshi does not disclose this feature, but states that Doshi discloses that each path can support multiple connections and points to col. 4, line 65 to col. 5, line 6 for support (Final Office Action – page 6). The Final Office Action further states that it is generally considered to be within the ordinary skill in the art to adjust, vary, select or optimize the numerical parameters of values of any system absent a showing of criticality and that the burden of showing criticality is on the applicant (Final Office Action – page 7). Appellants respectfully disagree.

Doshi, as discussed above, merely discloses that virtual provisioning server 230 determines the maximum number of voice calls that can be supported simultaneously between any pair of packet circuit gateways 215. Doshi does not disclose or suggest that a path control unit is configured to set a new path when a first path exists, much less that the new path has a bandwidth that is equal to or more than a hundred times the first bandwidth, as required by claim 2.

Appellants further submit that the bare assertion that the claimed feature is not critical to somehow shift the burden to Appellants is inappropriate. Appellants assert that the Examiner has provided no objective motivation for modifying Doshi to include the feature recited in claim 2.

For at least these reasons, Appellants respectfully submit that the rejection of claim 2 is improper. Accordingly, reversal of the rejection of claims 2, 7, 9 and 11 is respectfully requested.

3. Claims 6, 8 and 13

Claim 6 recites a path setting method of setting a path to which a bandwidth is ensured on a network using an Internet protocol connected between a first voice network and a second voice network to execute voice communication between a telephone associated with the first voice network and a telephone associated with the second voice network. The method includes determining whether a first path having a residual bandwidth larger than a first bandwidth necessary for transferring a voice over Intent protocol (VoIP) packet between two edge label switch routers exists; and setting a new path having a bandwidth that is equal to or more than double the first bandwidth, when it is determined that the first path does not exist.

Similar to the discussion above with respect to claim 1, Doshi at col. 4, line 65 to col. 5, line 6 merely discloses that virtual provisioning server 230 calculates the need for added capacity within IP network 205 to meet current and future bandwidth needs. This portion of Doshi further discloses that by centrally calculating and determining required network bandwidth, virtual provisioning server 230 determines the maximum number of voice calls that can be supported simultaneously between any pair of packet circuit gateways 215. This portion of Doshi, however, does not disclose or suggest that server 230 determines whether a first path having a residual bandwidth larger than a first bandwidth necessary for transferring a voice over Intent protocol (VoIP) packet between two edge label switch routers exists and sets a new path having a bandwidth that is equal to or more than double the first bandwidth, when it is determined that the first path does not exist, as required by claim 6. In other words, Doshi merely discloses that virtual provisioning server 230 of Doshi merely provisions traffic over existing links. Doshi does not disclose or suggest setting a new path when it is determined that a first path (having a

residual bandwidth larger than a first bandwidth) does not exist, much less that the new path has a bandwidth that is equal to or more than double the first bandwidth, as required by claim 6.

For at least these reasons, Doshi does not disclose or suggest each of the features of claim 6. Accordingly, Appellants respectfully submit that the rejection of claim 6 is improper and reversal of the rejection of claims 6, 8 and 13 is respectfully requested.

4. Claims 15-17

Claim 15 recites a device that includes a controller configured to receive a call request associated with establishing a voice connection between a first device and a second device via a network, the voice connection using voice over Internet protocol (VoIP). Claim 15 also recites that the control is configured to determine whether a first label switching path exists in the network between a first router and second router, the first router and second routers being involved in routing VoIP packets between the first device and second device, and request, when the first label switching path does not exist, that the first router establish a second label switching path to the second router, the second label switching path having a bandwidth of at least two times a bandwidth needed for transferring a VoIP packet between the first and second devices.

Similar to the discussion above with respect to claim 6, Doshi discloses that virtual provisioning server 230 of Doshi provisions traffic over existing links. Doshi does not disclose or suggest requesting (when it is determined that the first label switching path does not exist), that the first router establish a second label switching path to a second router, much less that the second label switching path have a bandwidth of at least two times a bandwidth needed for transferring a VoIP packet between the first and second devices, as required by claim 15. In

contrast, Doshi discloses provisioning delay sensitive and delay insensitive traffic over existing links. Doshi, however, does not disclose or suggest that provisioning server 230 or any other device in Doshi requests that a first router establish a second label switching path to a second router in response to determining that a first label switching path does not exist, as required by claim 15.

For at least these reasons, Doshi does not disclose or suggest each of the features of claim 15. Accordingly, Appellants respectfully submit that the rejection of claim 15 is improper and reversal of the rejection of claims 15-17 is respectfully requested.

VIII. CONCLUSION

In view of the foregoing arguments, Appellants respectfully solicit the Honorable Board to reverse the Examiner's rejections of claims 1-17.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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IX. APPENDIX

1. An Internet telephone system for voice communication between a telephone subscribing to a first voice network and a telephone subscribing to a second voice network via a network using an Internet protocol, comprising:

a plurality of label switch routers configured to use a label switching technique;

a first media gateway coupled to a first one of the plurality of label switch routers and a first signaling transfer point connected to said first voice network;

a second media gateway coupled to a second one of the plurality of label switch routers and a second signaling transfer point connected to said second voice network;

a path control unit configured to:

determine whether a first path having a first bandwidth larger than a bandwidth necessary for transferring a voice over Internet protocol (VoIP) packet between said first label switch router and said second label switch router exists, and

when it is determined that the first path having the first bandwidth does not exist, set a new path having a bandwidth that is equal to or more than double the bandwidth necessary for transferring the VoIP packet; and

a packet control unit, coupled to said path control unit, configured to:

instruct said first media gateway and said second media gateway to transfer VoIP packets via the first path or the new path.

2. The Internet telephone system of claim 1, wherein the new path has a bandwidth that is equal to or more than a hundred times the first bandwidth.

3. The Internet telephone system of claim 1, further comprising:

a route control unit configured to control said plurality of label switch routers.

4. The Internet telephone system of claim 3, wherein said route control unit is provided to each label switch router.

5. The Internet telephone system of claim 3, wherein said route control unit is connected to all of the plurality of label switch routers.

6. A path setting method of setting a path to which a bandwidth is ensured on a network using an Internet protocol connected between a first voice network and a second voice network to execute voice communication between a telephone associated with the first voice network and a telephone associated with the second voice network, comprising:

determining whether a first path having a residual bandwidth larger than a first bandwidth necessary for transferring a voice over Intent protocol (VoIP) packet between two edge label switch routers exists; and

setting a new path having a bandwidth that is equal to or more than double the first bandwidth, when it is determined that the first path does not exist.

7. The path setting method of claim 6, wherein said new path has a bandwidth that is equal to or more than a hundred times the first bandwidth.

8. A call control apparatus for setting a path to which a bandwidth is ensured on a network using an Internet protocol connected to a first voice network and a second voice network to execute voice communication between a telephone coupled to said first voice network and a telephone coupled to said second voice network, comprising:

a path control unit configured to:

determine whether a first path having a residual bandwidth larger than a first bandwidth necessary for transferring a voice over Internet protocol (VoIP) packet between a first label switch router and a second label switch router exists, and

when it is determined that the first path does not exist, set a second path having a bandwidth that is equal to or more two times the first bandwidth; and

a packet control unit configured to control a first media gateway and a second media gateway connected to said first and second label switch routers, respectively, to transfer said VoIP packet via the first path or said second path.

9. The call control apparatus of claim 8, wherein the second path set by said path control unit has a bandwidth of a hundred times of said first bandwidth.

10. A router connected between a first voice network and a second voice network to implement voice communication between a telephone associated with a first voice network and a telephone associated with a second voice network, comprising:

logic configured to set a path having a first bandwidth that is at least two times a bandwidth necessary for transferring a voice over Internet protocol (VoIP) packet in accordance

with control by a call control apparatus, thereby establishing a plurality of connections in said path.

11. The router of claim 10, wherein said path has a bandwidth of at least one hundred times the first bandwidth.

12. The router of claim 10, wherein said router is a label switch router.

13. A computer program product for implementing a call control apparatus for setting a path between a first voice network and a second voice network, said computer program product comprising:

instructions for determining whether a first path having a bandwidth larger than a bandwidth necessary for transferring a voice over Internet protocol (VoIP) packet between two label switch routers exists;

instructions for setting, when it is determined that the first path does not exist, a new path having a bandwidth that is equal to or more than two times the first bandwidth; and

instructions for controlling a media gateway connected to at least a first one of said two label switch routers to transfer said VoIP packet via the first path or said new path.

14. The computer program product of claim 13, wherein the new path has a bandwidth that is one hundred times the first bandwidth.

15. A device, comprising:

a controller configured to:

receive a call request associated with establishing a voice connection between a first device and a second device via a network, the voice connection using voice over Internet protocol (VoIP),

determine whether a first label switching path exists in the network between a first router and second router, the first router and second routers being involved in routing VoIP packets between the first device and second device, and

request, when the first label switching path does not exist, that the first router establish a second label switching path to the second router, the second label switching path having a bandwidth of at least two times a bandwidth needed for transferring a VoIP packet between the first and second devices.

16. The device of claim 15, wherein the controller is further configured to:

manage the use of labels associated with label switching in the network such that transfer of a VoIP packet from the first device to the second device through at least one other device uses a single label.

17. The device of claim 16, wherein each of the first and second devices comprises an edge router and the other device comprises a core router.

X. EVIDENCE APPENDIX

None

XI. RELATED PROCEEDINGS APPENDIX

None